

From: [Jennifer Woronets](#)
To: [Chip Humphrey/R10/USEPA/US@EPA](#)
Cc: [Gene Revelas](#); [jim.mckenna@verdantllc.com](#); [D Ashton](#); [Keith Pine](#); [Laura Jones](#); [Sue Trevathan](#); (b) (6); [Jennifer Woronets](#); [Betz, Jan](#); [Bob Wyatt](#); [david.ashton@portofportland.com](#); [Frederick.wolf@total.com](#); (b) (6); [Jennifer Woronets](#); [jim.mckenna@verdantllc.com](#); [karen.traeger@total.com](#); [Madalinski, Kelly](#); [pdost@pearllegalgroup.com](#); [Rick.Applegate@portlandoregon.gov](#); [Steve Parkinson](#); [aebbetts@stratusconsulting.com](#); [ANDERSON.Jim@deg.state.or.us](#); [audiehuber@ctuir.com](#); [Bob Wyatt](#); [Colin Wagoner](#); [cunninghame@gorge.net](#); [erin.madden@gmail.com](#); [Chip Humphrey/R10/USEPA/US@EPA](#); [JD Williams](#); [Jennifer Peers](#); [Jennifer Woronets](#); [jim.mckenna@verdantllc.com](#); [Julie Weis](#); [Keith Pine](#); [Kristine Koch/R10/USEPA/US@EPA](#); [lisa.bluelake@grandronde.org](#); [Madalinski, Kelly](#); [matt@jdw-law.net](#); [MCCLINCY Matt](#); [Michael Karnosh](#); [Rick.Applegate@portlandoregon.gov](#); [Robert Neely](#); [Rose Longoria](#); [tzeilman@qwestoffice.net](#)
Subject: FW: CSM Section Proposed Revisions
Date: 02/03/2011 11:40 AM
Attachments: [2011-02-03 EPA CSM Outline Response Table.pdf](#)

Chip,

Please see below and attached CSM section proposed revisions from Gene.

Thank you,
Jen Woronets ☺
Anchor QEA, LLC
jworonets@anchorqea.com
1010 NW Flanders, Suite 204
Portland, OR 97209

503-688-5057 Ext 14



Please consider the environment before printing this email.

The information is intended to be for the use of the individual or entity named above. If you are not the intended recipient, please be aware that any disclosure, copying, distribution or use of the contents of this information is prohibited. If you have received this electronic transmission in error, please notify us by electronic mail at jworonets@anchorqea.com

From: Gene Revelas [<mailto:grevelas@integral-corp.com>]
Sent: Thursday, February 03, 2011 10:14 AM
To: Jennifer Woronets
Cc: [jim.mckenna@verdantllc.com](#); [David Ashton](#); [Keith Pine](#); [Laura Jones](#); [Nick Varnum](#); [Sue Trevathan](#)
Subject: CSM Section Proposed Revisions

Hi Chip -

The attached table details the LWG's proposed approach for revising Section 10 (CSM) of the draft RI in accordance with the outline provided in EPA's December 8, 2010 letter and follow-on discussions between EPA and the LWG on January 25, 2011. The outline EPA provided addresses the specific content of Section 10.2 of the CSM (the chemical-by-chemical CSM narratives and supporting data products, e.g., the chemical-specific panels). Section 10.1 (Site Conceptualization) will remain as the first portion of Section 10 and will be revised in accordance with EPA specific comments on that section.

At the EPA/LWG meeting on January 25th, it was agreed that the existing outline of Draft RI Section

10.2 (i.e., header names/section numbers) would not be revised, but that the revision of this section would focus on addressing the specific content requested by EPA. Column 1 of the attached table lists EPA's requested Section 10.2 outline. Column 2 lists where the requested information is currently found in the RI or where it will be added based on this and other EPA RI specific comments. Column 3 of the table then provides the LWG's proposed approach for addressing EPA's Section 10.2 content request and how that information will be cited and/or summarized in the revised Draft Final RI Section 10.2. In a few instances, the LWG does not think it is able to provide the requested information. Those instances are bolded in EPA's outline (1st column of the attached table) and the LWG's rationale for its suggested approach is indicated in red font (in the 3rd table column).

Two other points regarding the revision of Section 10 were raised by EPA at the Jan 25th meeting. These represented new comments on Section 10 that were not included in previous written comments provided by EPA on the RI, including the December 8th letter which addressed the CSM issue. The first new EPA comment requested a description of how the 13 CSM ICs were selected. A similar EPA specific comment on RI Section 5 requested an expanded discussion of how all IC lists used in the RI were developed. The LWG agreed to address this comment and this revision is being prepared. The Draft Final RI Section 10.2 will summarize how that process was used specifically to select the 13 CSM ICs (and will cite the detailed revised Section 5 narrative).

The second new EPA comment requested that information showing the location of historical major industrial activities be placed on the Section 10 panels. The LWG had previously agreed to present maps of the current and historical locations of major industrial activities as part of the revision to the EPA comments on Section 4 (Source Evaluation) and these new maps will be included as part of a new Section 3.2.1 (Historical and Current Land Use). The information on these new RI maps will be incorporated in a summarized form on the Section 10 panels. The exact graphical approach to this challenging GIS task is being developed, but the LWG understands and agrees to address the request.

We are available to discuss and resolve this issue as needed.

Thanks,

Gene

Gene Revelas | Senior Managing Scientist
Integral Consulting Inc. | www.integral-corp.com
1205 West Bay Drive NW | Olympia, WA 98502
Tel: 360.705.3534, ext. 18 | Cell: 360.870.4950 | Fax: 360.705.3669

HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY